ROUNDY'S SUPERMARKETS, INC.

Pick 'n Save · Copps · Metro Market · Mariano's

2017 Green Tier Annual Report

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

July 2018

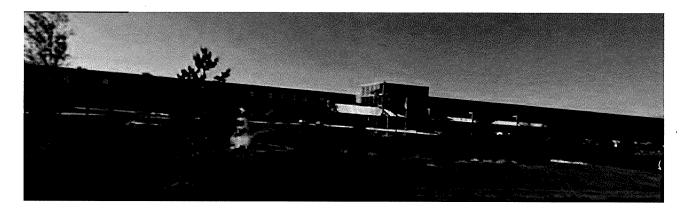


Table of Contents

1. Executive Summary	1
2. Business Overview	2
2.1 Roundy's Supermarkets Inc. Corporate-wide Continual Improvement	2
2.1.1 Wisconsin Partners for Clean Air Partnership	3
2.1.2 New and Existing Store Initiatives	3
2.1.2(a) Facility Management Systems (FMS) Update	3
2.1.2(b) LED (Light Emitting Diode) Technology	4
2.1.2(c) Day Lighting Technology	4
2.1.2(d) Closed Refrigeration Case Retrofit	5
2.1.2(e) 2017 Renewable Energy Initiatives	5
2.1.2(f) Zero Construction Waste Initiative	6
2.1.2(g) Energy & Sustainability Mission Statement	6
3. Environmental Management System (EMS) Status	7
4. 2006 / 2010 Agreement	7
4.1 Minimize Energy Use	7
4.2 Waste Minimization	8
4.2.1 2017 Plastic Recycling	9
4.2.2 2017 Cardboard Recycling	10
4.2.3 2017 Metal Recycling	11
4.3 Evaluate Vendor Technologies	13
4.3.1 CNG 13	13
4.4 Transportation	14
4.4.1 Super Single Tires	14

i

Table of Contents

7. Closing	22
6. Annual Metrics Reporting	22
5.3 Stakeholder Involvement	21
5.2 Supply Chain	21
5.1 Energy and Climate Change	21
5. Annual Report Environmental Performance	21
4.6.2 About The Kroger Co. Foundation	20
4.6.1 Oconomowoc Distribution Center Efforts	19
4.6 Continued Community Efforts	19
4.5 Stakeholder Education	17
4.4.5 Ride Share Program	17
4.4.4 Speed control Technology	16
4.4.3 Idling Provisions	15
4.4.2 Trailer Skirts	15

Appendices

- A WDNR Amended 2015 Green Tier Acceptance Letter for Tier 1
- B WDNR Air Management Emission Reduction Calculations
- C Roundy's Driver/Unloader Responsibilities Oconomowoc Distribution Center
- D WDNR Green Tier Sustainability Metrics Spreadsheet
- E EMS Audit 2015 Letter of Conformance

ii

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

1. Executive Summary

Roundy's Supermarkets, Inc. (Roundy's) is pleased to provide its eleventh Annual Report under Green Tier. This report covers the activities and accomplishments related to the Roundy's Oconomowoc Distribution Center, a Green Tier participant since December 22, 2006.

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

2. Business Overview

As a division of Cincinnati based The Kroger Co., Roundy's, headquartered in Milwaukee, Wisconsin, operates as one of the Midwest's oldest and largest grocers. As of June 30, 2018, the division owns and operates 150 retail grocery stores in Wisconsin and Illinois under the Pick 'n Save, Copps Food Center, Mariano's, and Metro Market banners. In 2017, Roundy's opened three new stores in Illinois.

This results-driven company emphasizes its customers, communities and respect for its employees. Its commitment to the environment and its people begins with its upper management and permeates throughout the organization.

By the end of 2017, the Roundy's and Kroger's private labels produce over 10,000 items under multiple brands such as Kroger, Big K ®, Fresh Selections by Kroger ®, and Simple Truth ®. Many of Roundy's signature items are made in its food processing plant in Kenosha, Wisconsin. In addition, Roundy's operates two Wisconsin distribution centers, including the 1.1 million square foot Oconomowoc Distribution Center facility opened in April 2005.

Roundy's has always strived to be a good neighbor, a positive influence on the community and to be a good environmental steward. Roundy's continues to show its commitment with involvement as a Green Tier participant

2.1 Roundy's Supermarkets Inc. Corporate-wide Continual Improvement

Although this annual report is largely focused on the Oconomowoc Distribution Center's Green Tier accomplishments, Roundy's continues to establish and implement energy-saving and environmentally conscious programs across our organization.

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

2.1.1.1 Wisconsin Partners for Clean Air¹ Partnership

The Wisconsin Partners for Clean Air ("WPCA") was a program that honored those businesses and organizations that have undertaken innovative strategies in the previous year to reduce harmful emissions. Roundy's received a WPCA Recognition Award in 2017 based on its efforts in 2016, discussed in more detail below, to install innovative refrigeration systems in its stores and to continue to invest in energy efficiency projects. Roundy's was previously selected to receive this award in 2011 based upon its demonstrated commitment to reducing emissions through voluntary actions and in 2014 for its commitment in areas such as environmentally friendly refrigeration and use of LED lighting, among many other efforts. In the past Roundy's also has maintained its involvement in WPCA by serving as a judge in years when Roundy's is ineligible for an award. Unfortunately, this program was disbanded in 2018, however Roundy's continues to install the innovative refrigeration systems and invest in energy efficiency projects as it did as a WPCA member.

2.1.1.2 New and Existing Store Initiatives

2.1,2(a) Facility Management Systems (FMS) Update

All of Roundy's facilities -- retail stores, commissary and distribution centers -- are monitored through Energy Star's Portfolio Manager System. Based on the Energy Star criteria, Roundy's currently has seventeen locations that qualify for the Energy Star certification. An FMS (building automation system) is installed in 83 stores, which includes the addition of the three new stores in 2017. The systems monitor, manage and control the lighting, heating, ventilation, and air conditioning (HVAC), department fan hoods, ceiling fans and sub-metering of electric and water. In 2018 Roundy's anticipates installing Kroger's monitoring system, Danfoss. Danfoss will operate in the same fashion as the current FMS system, but has the additional capability of offsite monitoring of the temperature systems.

3

¹ The WPCA program is a coalition of over 250 businesses, community organizations, schools and government agencies committed to improving air quality through voluntary action. WPCA educates Wisconsin businesses and residents on air quality issues and works to effect behavior to improve air quality and reduce harmful air emissions as required by Wisconsin's state implementation plan under the federal Clean Air Act. See http://www.cleanairwisconsin.org/businesses/aboutus.php

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

In 2012, Roundy's evaluated the use of a complete ${\rm CO_2}$ refrigeration design at store level. In 2013 the system was installed in the new Menomonee Falls Pick 'n Save store (which opened in January 2014). The Menomonee Falls Pick 'n Save refrigeration system utilizes ${\rm CO_2}$, an alternative to HFC (hydro-fluorocarbon) refrigerants. After analyzing the results of this system Roundy's decided to utilize it in all new stores. All three stores opened in 2017 installed the ${\rm CO_2}$ refrigeration system, for a total of 11 stores with this system.

In 2017 Roundy's continued to be a GreenChill Member, which is a voluntary program through the EPA where retailers commit to reduce emissions of ozone depleting substances from their stores. Kroger is also a member of GreenChill and in the future Roundy's will be reporting with them. As a part of GreenChill Roundy's installed the CO₂ refrigeration discussed above. Additionally, Roundy's is in the process of certifying all CO₂ refrigeration in the stores as Platinum level achiever which is the highest rank achievable in the GreenChill program.

Also at the store level, Roundy's does not allow vendors to idle engines while loading or unloading.

2.1.2(b) LED (Light Emitting Diode) Technology

LED design standards have been in place for several years for certain store areas, including produce, liquor, frozen door cases, exit signs and building signage. Roundy's has since added LED design standards to open multi-deck cases and walk in coolers/freezers. At the end of 2017 40 stores were converted to 100% LED cases. It is Roundy's goal to have all stores converted to 100% LED cases by the end of 2018. Since 2014 Roundy's has been integrating LED lighting in exterior parking lot lights. In 2017 all three of the new stores built were constructed with LED parking lot lights, and although no stores were retrofitted with LED parking lot lights, Roundy's is working on retrofitting stores in 2018. In addition to parking lot and case conversions to LED, in 2017 Roundy's built the 3 new stores and converted 11 stores to 100% LED. This includes cases, spot lights, vapor tights in coolers and freezers, glass doors, and the overhead lights. Roundy's continually seeks to improve the energy savings that LED lights provide by testing and incorporating new generations of lower wattage and more efficient bulbs as they become available. The technology has proven to provide improved lighting characteristics as well as energy efficiencies.

2.1.2(c) Day Lighting Technology

Starting in 2013 Roundy's has designed its stores with more windows than in the past in order to take advantage of day lighting technology. In 2013, two stores were built

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

with a raised roof section to allow for ribbon windows on the interior to act as skylights. This strategy increases the ability to use natural light for maximum visual comfort and to reduce energy consumption. This has continued in 2017 with new Mariano's stores being built with glass atriums to provide natural light into the stores.

2.1.2(d) Closed Refrigeration Case Retrofit

In 2017 Roundy's converted 618 feet of open medium temperature refrigeration cases to new closed refrigeration cases. This retrofit also included changing lights to LED and replacing old inefficient motors. This project resulted in 499,308 kwh of annual electric savings and 58,484 annual therms savings. *

*These numbers are tracked through Focus on Energy.

2.1.2(e) 2017 Renewable Energy Initiatives

In 2017, Roundy's continued its participation in Wisconsin's Focus on Energy Incentive Program that involved the implementation of various cost-effective energy efficiency and renewable projects. According to Focus on Energy, the total energy savings from all Wisconsin projects Roundy's submitted to the program in 2017 were 5,040,501kWh. This involved 37 projects at 37 different store locations. Roundy's was able to utilize \$216,984 in incentives and saved an estimated 4,076 metric tons of CO₂ from being released.

Roundy's also implemented projects in its Illinois stores, these included the construction of 3 new stores, where according to Com Ed, their energy efficient design resulted in a savings of 2,997,629 kWh when compared to a standard supermarket. The total savings in 2017 between ComEd and Focus on Energy was 8,038,130kWh which equates to approximately 6,489 tons of (CO₂) averted.²

Another visible way Roundy's gets involved with green awareness is by continuing to offer reusable bags. Roundy's rewards customers who use reusable bags by providing them with a rebate. For calendar year 2017 more than 17 million rebates were given to customers who used reusable bags.

Many of these initiatives are identified and implemented by Roundy's corporate full-time Energy Program Manager.

5

² CO₂ was calculated using the United States Environmental Protection Agency Clean Energy Green House Gas Equivalencies Calculator at: http://www.epa.gov/cleanenergy/energy-resources/calculator.html

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

2.1.2(f) Zero Construction Waste Initiative

In 2017 Roundy's, as a part of any substantial construction project, started to require contractors to divert construction waste away from landfill by recycling and reusing as many materials as possible. In 2017, 10 construction projects were tracked and 501.6 tons of waste were diverted which was a diversion rate of approximately 80%.

2.1.2(g) Energy & Sustainability Mission Statement
Roundy's has developed the following mission statement for its energy and sustainability efforts:

ROUNDY'S Energy & Sustainability Mission Statement

Roundy's Energy and Sustainability team is committed to enhancing the well-being of our customers, associates, communities, and global environment. We are dedicated to reducing energy demand and consumption through innovations in technology and environmentally friendly resources.

The team will focus on increasing and promoting positive awareness of our conservation efforts. As a leader, we will cooperate and support local and national energy programs. Our devotion will maintain Roundy's standard of excellence in providing the best possible experience for the customer.

6

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

3. Environmental Management System (EMS) Status

The Roundy's Oconomowoc Distribution Center environmental team initially developed and implemented its EMS in 2007. Pursuant to statute, an external audit of the EMS must be conducted every three years. 2017 was not an external audit year. The audit completed in 2015 by Perfect Environmental Performance found, "The results of the audit indicate that the Roundy's Distribution Center's environmental management system **is** in conformance with the requirements found in 299.83 (dg) of the Environmental Results Program and that it is operationally equivalent to the ISO 14001(2004) standard. There were no major or minor nonconformities identified during this audit. The Roundy's Environmental Management System also demonstrated performance that can be classified as "superior environmental performance. Based upon these findings, the Roundy's Oconomowoc Distribution Center environmental management system **has** been found to continue to meet the "Functionally Equivalent" criteria and the continual improvement requirements of the Green Tier Program.³

4. 2006 / 2010 Agreement

Roundy's participation in Green Tier dates back to December 22, 2006, when the Wisconsin Department of Natural Resources (WDNR) first accepted it into the program. In November, 2010, Roundy's re-confirmed its commitment to Green Tier. The updated commitment letter is attached at Appendix A. Information outlining Roundy's continual efforts to address its Green Tier measures at the Oconomowoc Distribution Center are outlined in the following section.

4.1 Minimize Energy Use

Roundy's 2016 Green Tier Annual Report detailed objectives and targets for 2017 relating to energy minimization. These are outlined below:

Objective: Reduce electricity and natural gas usage at Oconomowoc warehouse.

³ Roundy's 3rd Year EMS Audit 2015 Letter of Conformance; Attached as Addendum E.

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

Target:

Seeking a 2% to 3% reduction at the Oconomowoc warehouse of 2016 levels by tracking kW hours and Therms.

Result:

Roundy's saw a decrease in the overall electric usage but saw an increase in natural gas at the Oconomowoc Distribution Center in 2017. Natural gas usage went from 225,849 Therms to 232,724 Therms. This is a 3.04% increase from 2016. This increase in natural gas usage is likely due to a change in food safety regulations which now requires that trailers be washed after every delivery. Natural gas is used to heat the water for each of these washes. Electricity usage went down from 18,146,646 kwh in 2016 to 17,482,368 kwh in 2017. This is a 3.66% decrease from the prior year and meets the targeted goal for electricity reduction.

Objectives and Targets for 2018

Objective: Reduce electricity and natural gas usage at Oconomowoc warehouse.

Target: Seeking a 2% to 3% reduction at the Oconomowoc warehouse of 2017 levels by tracking kW hours and Therms.

4.2 Waste Minimization

The Oconomowoc Distribution Center continues to work towards greater waste minimization. In 2012, a project was started that included the introduction of a project to convert food waste into compost throughout our network. In 2013 that project was expanded as Roundy's partnered with a third-party firm and worked on a pilot project in 13 stores to convert produce into animal feed. The composting pilot program continued in 2017 with all Roundy's stores participating and 12,000 tons of food waste diverted. Roundy's will continue this program in 2018.

Roundy's continues, where feasible, to reuse select sturdy product containers for packing and shipping to and from the Oconomowoc Distribution Center. For example, the facility has fully converted to plastic pallets that are reused for all shipping occurring on the Roundy's fleet. Plastic flip sheets are also used as a stable base when stacking certain products on a pallet, replacing traditional cardboard sheets and, thus, further reducing cardboard usage.

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

Roundy's continues to maintain its program for recycling cardboard, scrap metal, and plastic. The Oconomowoc Distribution Center serves as an aggregation point for plastic, cardboard, and scrap metal for both this facility and the retail stores it services. The Oconomowoc Distribution Center also continues to deice parking lots with sand instead of salt. The use of sand, however, requires more effort from the Oconomowoc Distribution Center as it must periodically sweep parking lots and the tractor yard during winter thaws. New sand is then applied during deteriorating weather conditions. The Oconomowoc Distribution Center continues to use a contractor to periodically remove used sand mixed with snow back to the contractor's operation where the sand is filtered and washed for reuse. In 2017, this practice resulted in approximately 110 tons of used sand being reclaimed.

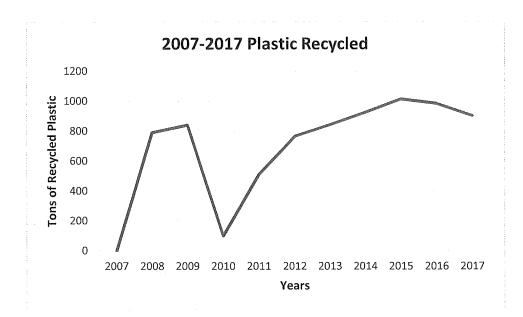
In addition to the specific recycling programs tracked below, the Oconomowoc Distribution Center provides for an employee recycling program. Though not specifically tracked, recycling opportunities exist for plastic, aluminum and paper.

4.2.1 2017 Plastic Recycling

Plastic is widely used at many distribution centers and grocery retailers to wrap pallets and cases prior to shipment. Product received from suppliers is often plastic wrapped and plastic is removed at the Oconomowoc Distribution Center to break apart the delivery and stage it for smaller shipments to individual Roundy's stores. In addition to this plastic wrap, the Oconomowoc Distribution Center currently includes in its recycling program bags, bubble wrap, and plastic pallet corner guards.

9

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

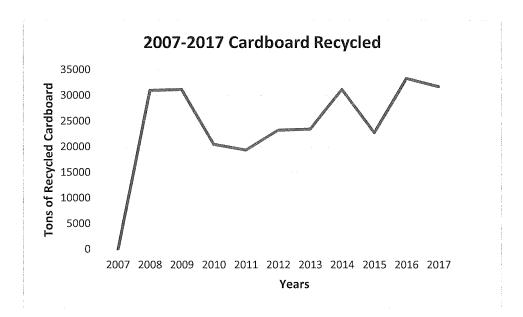


In 2017, plastic recycling at the Oconomowoc Distribution Center totaled 902.4 tons, slightly down from 984.3 tons in 2016. The decrease in plastic recycled from 2016 to 2017 can likely be linked to items being shipped to the Distribution Center from manufacturers with less plastic, to reduce costs and the greater use of reusable bags by customers. The Oconomowoc Distribution Center continues to look for more sources for recycling and continues to track conformance with its internal recycling program through formal and informal source segregation inspections and observations. Additionally, company representatives undergo awareness training and the program provides continued diligence through supervisor monitoring for adherence to the recycling program.

4.2.2 2017 Cardboard Recycling

In 2017, a total of 31,725 tons of cardboard were recycled, which represents a decrease of 1,607 tons from 2016 levels. Mirroring the decrease in plastic recycled, the decrease in cardboard recycled from 2016 to 2017 can likely be linked to items being shipped to the Distribution Center from manufacturers with less cardboard, to reduce costs.

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

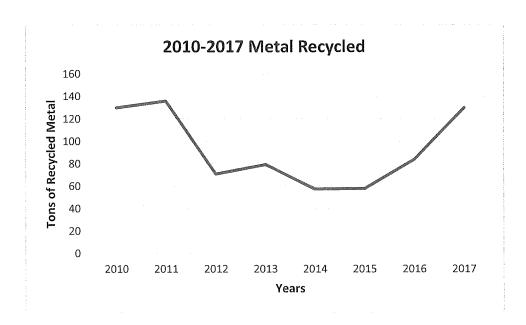


The Oconomowoc Distribution Center continues to look for more sources for recycling and continues to track internal conformance through formal and informal source segregation inspections and observations. Additionally, company representatives have awareness training and continued diligence through supervisor monitoring for adherence to the recycling program. All of these activities will help promote cardboard recycling.

4.2.3 2017 Metal Recycling

In 2017 approximately 130 tons of scrap metal were recycled from the Oconomowoc Distribution Center. This volume includes scrap metal collected from the retail stores that is accumulated at the Oconomowoc Distribution Center. This figure is a significant increase from 2016 levels due to to the additional equipment assets that were decommissioned and store material removed during the many store renovations completed in 2016 and 2017.

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin



Roundy's 2016 Green Tier Annual Report detailed objectives and targets for 2017 relating to waste minimization. These are outlined below:

Objective: Reduce waste to landfill though recycling cardboard, plastic and pallets.

Target: Increase recycling of cardboard and plastics by 2% to 3% over 2016

normalized values.

Result: In 2017 plastic recycling was reduced by 81.9 tons, a 8.3% decrease in

recycled materials. Cardboard recycling was reduced by 1,607 tons, a 4.8% decrease. Metal recycling had a significant increase of 45.9 tons, a

54.6% increase. An analysis of these results are provided in the

preceding sections.

Objective: Continue compost program.

Target: Utilize the compost program in all 151 existing Roundy's stores and all

new stores built in 2017.

Result: Roundy's completed the integration of the compost program into all

operating stores. In 2017 12,000 tons of food were diverted. This is a

252% increase from 2016.

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

Objectives and Targets for 2018

Objectives: Reduce waste to landfill through recycling cardboard, plastic, and scrap

metal.

Target: Increase recycling of cardboard and plastics by 2% to 3% over 2017

normalized values.

Objective: Continue compost program.

Target: Increase composting tonage by 3% over 2017 normalized values.

4.3 Evaluate Vendor Technologies

Per its Green Tier commitment, Roundy's also continually evaluates whether new technological and operational equipment processes and/or devices might present an actual benefit to reducing mobile emissions and improved fuel economy. Roundy's also works with the WDNR to evaluate the potential, estimated emission reductions associated with its transportation efforts. The information presented concerning estimated emission reductions associated with Roundy's transportation efforts are all calculated based upon estimated vehicle miles traveled attributed to the Oconomowoc Distribution Center. This section of the report will also, however, provide information on transportation requested by WDNR's Green Tier Annual Report Guidance dated August 19, 2015.

At the end of 2017, the Oconomowoc Distribution Center fleet consisted of (21) MY 2005, (12) MY 2007, (9) MY 2008, (1) CNG, (5) MY 2017, and (12) MY 2018.

4.3.1 CNG

On June 26, 2013 Roundy's began a pilot project utilizing an alternate fuel tractor to determine if a 12 Liter compressed natural gas ("CNG") engine would perform consistent with its current business model and needs. A MY 2013 tractor with a 12 Liter CNG engine was leased from June 26 to July 14, 2013, with the purpose of tracking natural gas fuel consumption and engine performance delivering actual loads to Roundy's grocery stores. The test demonstrated that the tractor had enough torque and horsepower to suit Roundy's application without concern. The test also provided enough preliminary fuel cost savings to justify the purchase of one new 12 Liter CNG powered tractor in 2014.

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

For purposes of this 2017 Annual Report, WDNR calculated the potential estimated emission reductions associated with replacing a heavy-duty diesel tractor with a tractor using CNG technology. Because the information readily available at this time to the WDNR within the EPA Diesel Emissions Quantifier only provides emission information associated with CNG fuel in general, and does not provide emission information associated with different sizes of CNG engines, the WDNR's calculated potential estimated emission reductions cannot be deemed to be representative of actual emission reductions at Roundy's ODC.

For purposes of WDNR's calculations, WDNR calculated the potential emissions associated with Roundy's average MY HD Diesel Truck traveling 17,616 miles using the MOVES 2014a model and the emissions associated with a MY 2014 CNG Truck based upon the use of 2,551 CNG equivalent gallons traveling 17,616 miles using EPA's Diesel Emissions Quantifier. The difference between the emissions calculated using a Roundy's average MY diesel tractor, and the emissions calculated using a MY 2014 CNG Truck, comprises the potential estimated emission reductions associated with replacing a Roundy's average MY diesel tractor with a MY 2014 CNG truck.

WDNR's calculations reflect a potential estimated emission reduction associated with the use of CNG technology as follows:

337 pounds of NOx
12.7 pounds of PM 2.5
36 pounds of VOC
92 pounds of CO
32.4 short tons or 64,800 pounds of CO₂

4.4 Transportation

4.4.1 Super Single Tires

Super Single Tires (referred to as single wide tires by the United States Environmental Protection Agency Smart Way Program) are intended to provide low rolling resistance – in other words, the tires are intended to reduce the drag from the weight of the tires on the road and thereby improve fuel efficiency.

For purposes of the 2017 report, WDNR estimated the potential yearly emission reductions associated with the Oconomowoc Distribution Center fleet's use of super

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

single tires by assuming that super single tires had been used on all diesel fleet trucks for all of 2017 and using EPA estimates that super single tires improve fuel efficiency by at least 3%. Using the 2017 ODC average fleet fuel efficiency of 7.32 miles per gallon with super single tires and a fleet average of 7.11 miles per gallon without super single tires, the installation of super single tires on a diesel fleet traveling an estimated 4,440,944 miles could potentially result in a reduction of 195 tons of CO₂. See Appendix B for the WDNR emission calculations.

4.4.2 Trailer Skirts

Trailer skirts are designed to reduce aerodynamic drag. Like the Super Single Tires, EPA's Smart Way program considers aerodynamic trailer skirting to be a verified technology category to reduce aerodynamic drag. Due to the majority of trailers having skirts, WDNR assumed that all Oconomowoc Distribution Center diesel vehicle miles traveled in 2017 involved trailers with skirts. WDNR in its emission calculation communication indicated that EPA estimates that aerodynamic trailer skirts improve fuel efficiency by at least 4% and that emission calculations from scientific studies show that aerodynamic trailer skirts are estimated to improve fuel efficiency from 5-7%. For purposes of this report, WDNR assumed a 5% fuel efficiency from use of skirts.

Results of WDNR's calculations show an estimated potential yearly reduction of 334 tons of ${\rm CO_2}$, assuming all estimated diesel vehicle miles traveled attributable to the Oconomowoc Distribution Center fleet included the use of trailers with skirts. Appendix B contains the WDNR calculations.

4.4.3 Idling Provisions

Roundy's prohibits all tractor-trailer trucks from idling on the premises. The only exceptions are when the temperature is above 90 or below 10 degrees Fahrenheit (see Appendix C). A short warm up may occur to prevent diesel fuel from gelling and engine startup difficulties. A copy of the Driver/Unloader Responsibilities handout containing Roundy's Oconomowoc Distribution Center idling policy is provided in writing to third-party vendors that deliver to the facility.

WDNR calculated estimated emission reductions associated with the Oconomowoc Distribution Center idling policy in accordance with the following assumptions:

 Based upon 1068 actual truck deliveries over a 7-day period in December, 2017, there is assumed to be an average of 153 truck trips per day to the Oconomowoc Distribution Center.

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

- Based upon data from that 7-day period, each truck was on site for an average of approximately 4.42 hours; however, 0.4 hours has been deducted for maneuvering and it is assumed that a driver would not physically be in a tractor for 0.95 hours for each trip.
- 3. Using these assumptions, emissions from idling could be reduced by approximately 3.07 hours per truck per day.
- 4. The Oconomowoc Distribution Center operated 362 days in 2017.
- 5. Using Roundy's Fleet Average MOVES 2014a Emission Factors for Heavy Duty Diesel Trucks, the estimated emission reductions from implementation of Roundy's idling policy in 2017 are as follows:

16.5 tons of CO 42 tons of NOx 7.6 tons of VOC 1,701 tons of CO₂ 0.47 tons of PM2.5

See Appendix B for WDNR emission calculations.

Going forward, the Oconomowoc Distribution Center will continue to restrict idling through a combination of measures. These include training Roundy's fleet drivers on anti-idling requirements and audits of compliance with the idling policy. Audits for compliance with the idling policy are included in the Oconomowoc Distribution Center internal audits that are conducted throughout the year. Transportation management staff conducts periodic, unannounced yard walks to confirm compliance with the policy. Finally, if a complaint is filed, then transportation management will respond appropriately.

4.4.4 Speed Control Technology

Roundy's utilizes technology such that when the tractor is in operation, the engine computer reduces the fuel when the driver reaches 63 miles per hour (mph) (referred to as speed control technology).

WDNR's evaluation of the potential impact this initiative can have in reducing air emissions is based upon the estimated total diesel vehicle miles traveled in 2017, includes an assumption that approximately 70 percent of travel is on highways and interstate roads and that speed control technology is active on all of the tractors.

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

WDNR's calculations resulted in total estimated potential emission differences of: 2,678 pounds of NOx reduced, 41 pounds of PM_{2.5} reduced, 185 pounds of VOC increased, 815 pounds of CO increased, and 616 tons of CO₂ reduced as a result of the use of speed control technology. More information concerning WDNR's emission calculations is presented in Appendix B.

4.4.5 Ride Share Program

In 2007, the Oconomowoc Distribution Center established a carpool program. At the program onset, the Center issued five carpool permits. The permit allows the designated carpool driver to park in a preferred parking spot that is nearest to an employee building entrance. In 2017, approximately the same number of employees used the rideshare program as in 2016, which was a total of 53.

WDNR calculated estimated emission reductions from the rideshare program based upon a 2011 Southeastern Wisconsin Regional Planning Commission (SEWRPC) travel survey indicating that the average roundtrip commute in the southeast Wisconsin seven-county region to and from work is 22 miles. WDNR also considered information on transportation research that quantifies potential benefits from rideshare programs. WDNR assumed 10 percent participation for its calculation of potential emission reductions for the Oconomowoc Distribution Center. Using 5.3 (10 percent X 53 employees) multiplied by 22 miles round trip would result in approximately 116.6 average miles. Assuming that a participating employee commutes to work an average of 230 days per year, in 2017 this could have resulted in a reduction of approximately 26,818 miles. Using emission factors for passenger vehicles, WDNR calculated estimated annual emission reductions of: 20 pounds of NOx, 12.7 pounds of VOC, 200 pounds of CO, 0.83 pounds of PM_{2.5} and 22,270 pounds of CO₂.

See Appendix B for WDNR's emission calculations.

In addition to the carpool program, the Oconomowoc Distribution Center offers preferred employee parking for motorcycle riders. There are also bike racks and shower facilities for those riding bikes to work.

4.5 Stakeholder Education

The Green Tier agreement and energy program at the Oconomowoc Distribution Center have resulted in energy conscious programs for new projects at existing stores and for new construction. The company continues to promote ideas and conversations

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

on energy conservation and waste minimization, not just at the Oconomowoc Distribution Center, but with internal stakeholders, our retail stores, and at the corporate headquarters building as described in Section 2.

Roundy's continues to utilize the Employee Environmental Continual Improvement suggestion program implemented in mid-2007 to record and respond to suggestions and comments from employees. All suggestions and feedback are logged into the Environmental Continual Action Database. Once logged, each idea, concern or question is evaluated at Management Review meetings for implementation or response. One example of this was the employee suggestion for a water bottle filling station that was implemented in 2016 and has saved 755,612 single-use bottles since its installation.

The Oconomowoc Distribution Center has the opportunity to make contact with hundreds of drivers daily as they deliver goods to the Oconomowoc Distribution Center. Each driver receives a copy of the Driver/Unloader Responsibilities handout documenting the Oconomowoc Distribution Center's idling policy, and information about Roundy's Environmental Policy attached at Appendix C. Roundy's idle policy is further discussed in Section 4.4.3 of this report.

Roundy's 2016 Green Tier Annual Report detailed objectives and targets for 2017 relating to stakeholder education. These are outlined below:

Objective: Educate employees on EMS, conservation and waste reduction

Target: Management will cover topics relating to each of these subjects in

quarterly EMS meetings.

Result: Management discussed EMS and the Green Tier program with

employees at monthly pre-shift huddles and weekly new hire training.

Objective: Educate store personnel on EMS, conservation, and waste reduction

Target: Give one tour a quarter of the Oconomowoc Distribution Center to store

personnel.

Result: Four tours were conducted for 120 store personnel, Information on EMS

was discussed on every tour and posted throughout the facility.

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

Objective: Educate other businesses regarding Green Tier and benefits of EMS.

Conduct two educational speeches or meetings per year to outside

parties.

Target:

Result: In September 2017 a meeting was held with associates at Aurora, and in

May 2017 a meeting was held with Pabst Farms Management. At both

meetings the Green Tier program was discussed.

Objectives and Targets for 2018

Objective: Educate employees on EMS, conservation and waste reduction

Target: Management will cover topics relating to each of these subjects in

quarterly EMS meetings.

Objective: Educate store personnel on EMS, conservation, and waste reduction

Target: Give one tour a quarter of the Oconomowoc Distribution Center to store

personnel.

Objective: Educate other businesses regarding Green Tier and benefits of EMS.

Target: Conduct two educational speeches or meetings per year to outside

parties.

4.6 Continued Community Efforts

4.6.1 Oconomowoc Distribution Center Efforts

The Oconomowoc Distribution Center continues its alliance with the Oconomowoc Area Chamber of Commerce. In 2010, Roundy's spearheaded an effort to create a Green Business Initiative Committee. The mission of the Committee is "to protect the environment by reducing waste, saving energy and eliminating pollution." According to the Committee:

It is our obligation to explore and implement environmentally sound business practices that reduce waste, save energy and prevent pollution. A cleaner environmental footprint will benefit our community, our businesses and set an

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

example for others to help guarantee a healthy environment for future generations. The Oconomowoc Area Chamber of Commerce is committed to partnering with its member businesses, and the community-at-large, to achieve these goals. ⁴

In 2011, the Oconomowoc Distribution Center began collaboration with the Oconomowoc Area Chamber of Commerce, the Oconomowoc School District, and the WDNR on a long-term program to protect and support Rosenow Creek, a Class A Trout Stream located within the Oconomowoc School District property.

At this time the Green Business Initiative Committee is no longer active through the Chamber of Commerce. However, Roundy's continues to communicate with the Chamber its interest in supporting environmentally friendly initiatives.

4.6.2 About The Kroger Co. Foundation

In 2003 Roundy's chartered the Roundy's Foundation. This was created to further strengthen the commitment between Roundy's Supermarkets, Inc. and the communities it serves. In 2015 The Kroger Co. ("Kroger") purchased Roundy's, however the commitment to serving the community has never wavered. In 2017 the Roundy's Foundation was merged into The Kroger Co. Foundation and all charitable works are now done through The Kroger Co. Foundation. The Kroger Co.'s purpose is to Feed the Human Spirit; The Kroger Co. Foundation supports communities' needs and finds innovative solutions to help end hunger.

Kroger's Zero Hunger Zero Waste initiative is Kroger's plan to end hunger in the communities it works in and to eliminate waste within the company by 2025. This plan includes establishing a \$10 million innovation fund through The Kroger Co. Foundation, accelerating food donations to give 3 billion meals by 2025, and advocating for public policy solutions to address hunger in the community.

In 2017 Roundy's through The Kroger Co. Foundation gave out 63 grants to local organizations dedicated to hunger relief which amounted to \$203,000. Roundy's continued its partnership with Hunger Task Force in 2017 to run the mobile grocery store, Fresh Picks Mobile Market, that travels throughout Milwaukee County covering food deserts and making food more accessible to the underserved. Roundy's also

⁴ http://www.oconomowoc.org/green-business.php

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

sponsored "Stuff the Squad" events at all stores in partnership with local police departments.

In addition to the above in 2017 Roundy's also, held fundraisers and gathered donations for the Houston hurricane victims, Didion plant explosion victims, victims of flooding near Burlington, Food for Families Food Drive, PB&J collection with Feeding America, and other various local food pantries. Roundy's also donated over \$100,000 in miscellaneous corporate donations that went to local community events.

5 Annual Report Environmental Performance

Roundy's is also providing information on the topics below as part of its annual report. Applicable information is either presented below or a reference is provided to where it is placed in other sections of this report.

5.1 Energy and Climate Change

The Oconomowoc Distribution Center was constructed with numerous energy conservation measures that have either been sustained or further improved. These include energy efficient lighting utilizing motion sensors, natural daylight, and sufficient insulation to provide cooling of non-freezer portions of the building during the normal summer season.

5.2 Supply Chain

Roundy's continues to communicate with its customers and vendors on the value of reusable pallets and plastic flip sheets and routinely uses these for shipments on Roundy's fleet. While the company cannot directly influence how manufacturers package their product for distribution, it must contend with the result from improper packaging from broken containers and boxes. Roundy's routinely communicates its experiences with vendors and/or manufacturers and salvages retail ready products from these deliveries.

5.3 Stakeholder Involvement

As described in Section 4.5 Roundy's has engaged in internal and external stakeholder coordination. Involvement with employees, suppliers, and customers is documented through:

Roundy's Oconomowoc Distribution Center Oconomowoc, Wisconsin

- Employee Suggestion Program
- Employee Training and Awareness
- Coordination with External Stakeholders, Drivers, Suppliers, and Vendors
- Participation in the Community through implementation of energy conservation programs at their stores

One specific example of stakeholders working in concert with Roundy's corporate continuous improvement efforts involved the construction of the new Shorewood Metro Market in 2016. It was an infill redevelopment project where the developer had a goal of recycling 85% of materials from demolition and construction. According to the developer, this goal was exceeded with a final diversion rate of 93.13%. 9,731.51 tons of materials were diverted from Wisconsin landfills⁵.

6 Annual Metrics Reporting

Metrics requested by WDNR are contained in the Wisconsin WDNR Green Tier Sustainability Metrics spreadsheet contained in Appendix D.

7 Closing

Roundy's Supermarkets Inc., is pleased to be a Tier 1 participant in Wisconsin's forward thinking Green Tier program. The program goals and objectives match the Company's thinking with regard to environmental stewardship and waste minimization.

⁵ Shorewood Metro Market Project: Final Recycling Report prepared by WasteCap Resource Solutions dated 3/31/2016.

Appendix A

WDNR Amended 2015 Green Tier Acceptance Letter for Tier 1



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor Scott Hassett, Secretary 101 S. Webster St.
Box 7921
Madison, Wisconsin 53707-7921
Telephone 608-266-2621
FAX: 608-267-3579
TTY Access via relay - 711

December 22, 2006

Mike Schmitt

| UPDATE: Current contact is Dan Farrell.
| Roundy's Supermarkets, Inc.
| PO Box 473
| Milwaukee, WI 53201

Subject: Green Tier Acceptance Letter for Tier 1

Dear Mr. Schmitt:

Thank you for completing an application for a Tier 1 agreement. The Department of Natural Resources (DNR) is pleased to approve your application and accept you into the Green Tier program. This letter of acceptance covers the Roundy's Supermarkets Inc. Oconomowoc Distribution Center, Oconomowoc, Wisconsin. This letter of acceptance is authorized by The Environmental Results Program Act, § 299.83, Wis. Stats., created by 2003 Wisconsin Act 276 (effective on May 1, 2004), which is commonly called the "Green Tier Law."

This letter recognizes that Roundy's has already satisfied one of its Green Tier commitments by voluntarily retrofitting more than one quarter of its Class 8 truck fleet with diesel oxidation catalysts (DOC). 32 Fleetguard DOCs were installed as direct replacements to the existing exhaust system on its 2001-2004 model year tractors. The DOCs are designed to reduce the emissions of certain air pollutants contained in diesel exhaust. As you will recall, this commitment was identified in your Indirect Source permit issued on May 18, 2004. Roundy's participation in the Green Tier program reflects your continuing commitment to superior environmental performance and continuous improvement. If future circumstances necessitate stepping back from this commitment, please notify us.

In addition to the DOC upgrade mentioned above, you have also agreed to the following examples of superior environmental performance:

- a) Continue to implement energy use minimization ideas, including occupancy sensors, daylighting, and use of high efficiency replacement bulbs and ballasts.
- b) Minimize waste cardboard and packaging waste from the distribution facility
- c) Evaluate whether certain technological and operational equipment, processes, and/or devices present an actual benefit to reducing mobile emissions and improved fuel economy. The scope of this evaluation will be developed and implemented on an ongoing basis with Mike Friedlander. Roundy's will commit to sharing this information with the DNR in a mutually agreed format.
- d) Educate stakeholders about the benefits of daylighting and green design

With this letter, you are encouraged to use the Green Tier Program logo on written materials that are related to your facilities. Attached to this Acceptance Letter is a unique certificate that recognizes you for participating in the Green Tier Program. The DNR will work with you to



Appendix ${\bf B}$

WDNR Air Management Emission Reduction Calculations

WDNR Air Management Emission Reduction Calculations

Web Linked Reports

http://www.epa.gov/smartway/forpartners/technology.htm http://www.vtpi.org/tdm/tdm34.htm http://cfpub.epa.gov/quantifier/index.cfm?action=fleet.edit

The emission factors are provided in a separate Excel spreadsheet. I used the same format and same model (MOVES2014a) that were used last year.

The Excel file has the following four tabs:

- 1. Commuting emission factors for passenger cars and passenger trucks
- 2. Truck emission factors for overall travel
- 3. Truck emission factors for extended idling
- 4. Truck running emission factors for speeds ranging from 60 mph to 70 mph

In all four cases, emissions factors are provided for five pollutants: NOx, PM_{2.5}, VOC, CO and CO₂.

Also, in all four of these cases, weighted average emission factors are provided for the applicable fleet, either the commuting passenger vehicles or the Roundy's trucks at the Oconomowoc Distribution Center (ODC):

These emission factors for year 2017 are consistently lower than those we provided last year for 2016. For the Roundy's trucks, the year 2017 emission factors are lower because many new trucks were added to the Roundy's fleet in 2017. For the Roundy employees, the commuting emission factors in 2017 are lower than those in 2016 for two key reasons: (1) one year of fleet turnover and (2) lower gasoline sulfur in 2017 than in 2016. The lower gasoline sulfur has an especially significant effect on NOx emissions.

For <u>passenger vehicles</u>, the "applicable fleet" consists of all model years weighted by the best available travel fractions for the area, those for the seven-county vehicle inspection and maintenance program area in southeastern Wisconsin.

In addition, emissions from one <u>Compressed Natural Gas (CNG) truck</u> of model year 2014 (17,616 total annual miles) were calculated using the USEPA Diesel Emissions Quantifier.

I should note that VOC and CO emissions go *down* with increased speed for the Roundy's fleet. However, NOx emissions go up more that VOC + CO go down, so the combined effect of those three pollutants is an increase as speed increases. $PM_{2.5}$ and CO_2 also go up with increased speed.

EMISSION REDUCTION CALCULATION FOR SPEED CONTROL PROGRAM

WDNR's evaluation of emission differences from this initiative is based on the estimated total vehicle miles traveled in 2017 and includes an assumption that approximately 70 percent of travel is on highways and interstate roads and that speed controls are active on all the tractors. WDNR calculated expected emissions at 70 mph and then at 62 mph, the difference between the two speeds comprises the estimated differences in emissions from use of the speed controls.

Estimated TOTAL MILES 2017 = 4,440,944 X 70% Highway = 3,108,661

- 3,108,661 X 5.570 NOx grams per mile @ 62 mph = 17,315,241 of NOx grams / 454 = 38,139 pounds of NOx
- 3,108,661 X 5.961 NOx grams per mile @ 70 mph = 18,530,728 of NOx grams / 454 = 40,817 pounds of NOx

2,678 pounds of NOx reduced

- $3,108,661 \times 0.193 \text{ PM}_{2.5}$ grams per mile @ 62 mph = 599,972 of PM_{2.5} grams / 454 = 1,322 pounds of PM_{2.5}
- $3,108,661 \times 0.199 \text{ PM}_{2.5}$ grams per mile @ 70 mph = 618,624 of PM_{2.5} grams / 454 = 1,363 pounds of PM_{2.5}

41 pounds of PM_{2.5} reduced

- 3,108,661 X 0.219 VOC grams per mile @ 62 mph = 680,797 of VOC grams / 454 = 1,500 pounds of VOC
- 3,108,661 X 0.192 VOC grams per mile @ 70 mph = 596,863 of VOC grams / 454 = 1,315 pounds of VOC

185 pounds of VOC increased

- $3,108,661 \times 1.09 \text{ CO}$ grams per mile @ 62 mph = 3,3088,441 of CO grams / 454 = 7,464 pounds of CO
- 3,108,661 X 0.971 CO grams per mile @ 70 mph = 3,018,510 of CO grams / 454 = 6,649 pounds of CO

815 pounds of CO increased

- $3,108,661 \times 1,632 \text{ CO}_2$ grams per mile @ 62 mph = 5,073,334,752 of CO₂ grams / 454 = 11,174,746 pounds of CO₂
- $3,108,661 \times 1,812 \text{ CO}_2$ grams per mile @ 70 mph = 5,632,893732 of CO₂ grams / 454 = 12,407,254 pounds of CO₂
- 1.232.509 pounds of CO2 decreased

616 tons of CO₂ decreased

EMISSION REDUCTION CALCULATION FOR SUPER SINGLE TIRES PROGRAM

Super Single Tires are considered a "verifiable control technology" by the EPA Smart way program. As such, EPA estimates that super single tires improve fuel efficiency by at least 3%. For the 2017 Annual Report, we assumed that all heavy-duty diesel trucks operating at the Oconomowoc Distribution Center were retrofitted with super single tires

Estimated TOTAL MILES = 4,440,944 TOTAL FUEL CONSUMPTION = 607,070 10,070 grams of CO₂ per gallon (22.2 pounds per gallon)

2017 ODC Average = 7.32 miles per gallon (mpg) 7.32 mpg / 1.03 = 7.11 mpg with no super single tires 7.32 – 7.11 = 0.21 super single fuel efficiency in mpg 4,440,944 / 7.11 mpg = 624,605 gallons Fuel savings = 17,535 gallons 389,285 pounds of CO₂ reduced 195 tons of CO₂ reduced

EMISSION REDUCTION CALCULATION FOR AERODYNAMIC TRAILER SKIRTS PROGRAM

Aerodynamic trailer skirts are considered a "verifiable control technology" by the EPA Smart way program. As such, EPA estimates that Aerodynamic trailer skirts improve fuel efficiency by at least 4%. Based on scientific studies, aerodynamic trailer skirts are estimated to improve fuel efficiency from 5 -7%. For the 2017 Annual Report, we assumed that all heavy-duty diesel trailers operating at the Oconomowoc Distribution Center were retrofitted with aerodynamic trailer skirts and applied the 5% efficiency improvement.

Estimated TOTAL MILES = 4,440,944 TOTAL FUEL CONSUMPTION = 607,070 10,070 grams of CO₂ per gallon (22.2 pounds per gallon)

2017 ODC Average = 7.32 miles per gallon 7.32 mpg / 1.05 = 6.97 mpg with no aerodynamic trailer skirts 7.32 - 6.97 = 0.35 aerodynamic trailer skirts efficiency in mpg 4,440,944 / 6.97 mpg = 637,151 gallons Fuel savings = 30,081 gallons 667,798 pounds of CO_2 reduced **334 tons of CO_2 reduced per year**

* CAVEAT - There may exist some unknown synergies between coupling super single tires and aerodynamic trailer skirts in these fuel efficiency calculations.

EMISSION REDUCTION CALCULATION FOR THE IDLE RESTRICTION PROGRAM

1068 truck deliveries over a 7-day period in December, 153 truck trips per day
The average amount of time that each truck is "on site" is 4 hours 25 Minutes 12 seconds (4.42)
Assume trucks maneuver on site for 24 minutes per trip - no net reduction (0.4)
Assume truckers would leave cab for 57 minutes per trip - no net reduction (0.95)
Assume the idle restriction reduces idle emissions by 3.07 hours per truck per day
Assume Roundy's Fleet Average MOVES Emission Factors for Heavy Duty Diesel Trucks

EXTENDED IDLE EMISSION FACTORS FOR HEAVY DUTY DIESEL TRUCKS

NOx 224.9 grams per hour PM_{2.5} 2.53 grams per hour VOC 40.57 grams per hour CO 88.20 grams per hour CO₂ 9,007 grams per hour

153 X 3.07 = 470 hours of idling prevented each day

470 hours X 224.9 = 105,703 grams of NOx / 454 = 233 pounds of NOx

470 hours X 2.531 = 1,190 grams of $PM_{2.5}$ / 454 = 2.6 pounds of $PM_{2.5}$

470 hours X 40.57 = 19,070 grams of VOC / 454 = 42 pounds of VOC

470 hours X 88.2 = 41,454 grams of CO / 454 = 91 pounds of CO

470 hours X 9,007 grams CO_2 / 454 = 9,324 pounds of CO_2 / 2000 = 4.7 tons of CO_2

The Oconomowoc Distribution Center was in operation 362 days in 2017.

233 pounds of NOx X 362 = 84,346 pounds / 2000 = 42 tons NOx reduced per year 2.6 pounds of PM_{2.5} X 362 = 941 pounds / 2000 = 0.47ton PM_{2.5} reduced per year 42 pounds of VOC X 362 = 15,204 pounds / 2000 = 7.6 tons VOC reduced per year 91 pounds of CO X 362 = 32,942 pounds / 2000 = 16.5 tons CO reduced per year 4.7 tons X 362 = 1,701 tons of CO₂ reduced per year

EMISSION REDUCTION CALCULATION FOR ROUNDY'S RIDESHARE PROGRAM

The emission factors for passenger vehicles cover all model years and are based on the Southeastern Wisconsin age distribution. The emission factors vary widely based on model year and vehicle type (passenger car or passenger truck)

My metric for rideshare as follows:

2011 SEWRPC travel survey reveals that average home-based work trip is 22 miles (11 X2). Rideshare programs have the potential to reduce vehicle miles traveled (VMT) between 5-15% if information is only provided, 10-30% if parking cash out is provided. I used the 10% as the assumption. 53 people at the Roundy's Oconomowoc Distribution Center are enrolled in the rideshare program. 53 * 0.10 =5.3 * 22 = 116.6. Assuming an enrolled employee commutes to work 230 days per year on average, the miles reduced annually is: 116.6 * 230 = 26,818

EMISSION FACTORS FOR PASSENGER VEHICLES

0.343 grams per mile

NOx

110/	oro to granto por timo
$PM_{2.5}$	0.014 grams per mile
VOC	0.215 grams per mile
CO	3.387 grams per mile
CO_2	377 grams per mile
26,818 * (0.343 = grams NOx reduced annually / 454 = 20 pounds NOx reduced per year
	0.014 = grams PM _{2.5} reduced annually / 454 = 0.83 pounds PM_{2.5} reduced per year
	0.215 = grams VOC reduced annually / 454 = 12.7 pounds VOC reduced per year
26,818 * 3	3.387 = grams CO reduced annually / 454 = 200 pounds CO reduced per year

26,818 * 377 = grams CO₂ reduced annually / 454 = 22,270 pounds CO₂ reduced per year

COMPRESSED NATURAL GAS (CNG) POTENTIAL EMISSION REDUCTION CALCULATION AS COMPARED TO DIESEL TRUCKS

For purposes of WDNR's calculations, WDNR first calculated the potential emissions associated with Roundy's average MY HD Diesel Truck travelling 17,616 miles. Potential emissions were based upon emission factors within the MOVES 2014a model.

```
9.705 g/mile NOx * 17,616 miles travelled = 170,963 / 454 = 377 pounds NOx 0.327 g/mile PM _{2.5} * 17,616 miles travelled = 5,760 / 454 = 12.7 pounds PM _{2.5} 0.967 g/mile VOC * 17,616 miles travelled = 17,035 / 454 = 38 pounds VOC 2.666 g/mile CO * 17,616 miles travelled = 46,964 / 454 = 104 pounds CO 1,902 g/mile CO<sub>2</sub> * 17,616 miles travelled = 33,505,632 / 454 = 73,801 pounds (37 tons) CO<sub>2</sub>
```

Next, using EPA's Diesel Emissions Quantifier, WDNR then calculated the emissions associated with a MY 2014 HD CNG Truck based upon 17,616 miles travelled and 2,551 CNG equivalent gallons.

```
0.020 Short tons of NOx or 40 pounds of NOx 0.000 Short tons of PM _{2.5} or 0 pounds of PM _{2.5} 0.001 Short tons of VOC or 2 pounds of VOC 0.006 Short tons of CO or 12 pounds of CO 4.6 Short tons of CO_2 or 9,200 pounds of CO_2
```

The difference between emissions calculated using Roundy's average MY HD Diesel Truck travelling 17,616 miles and the emissions calculated using MY 2014 HD CNG Truck travelling 17,616 miles and using 2,551 equivalent gallons pursuant to EPA's Diesel Emissions Quantifier comprises the potential emission reductions associated with replacing an average MY HD Diesel Truck with a MY 2014 HD CNG Truck.

WDNR's calculations reflect a potential estimated emission reduction associated with the use of CNG technology as follows:

```
337 pounds of NOx
12.7 pounds of PM <sub>2.5</sub>
36 pounds of VOC
92 pounds of CO
32.4 short tons or 64,800 pounds of CO<sub>2</sub>
```

Appendix C

Roundy's Driver/Unloader Responsibilities Oconomowoc Distribution Center

ROUNDY'S SUPERMARKETS. INC.

PICK 'N SAVE · COPPS · RAINBOW FOODS

DRIVER / UNLOADER RESPONSIBILITIES OCONOMOVOC DISTRIBUTION CENTER

The Roundy's Oconomowoc Distribution Center is a proud participant in the Wisconsin Department of Natural Resources Green Tier program for Environmental Excellence.

Our Environmental Policy is:

Roundy's is committed to managing our products and processes in an environmentally responsible manner by complying with requirements, by preventing pollution, and by improving continually.

- ♦ We will do this through:
- ❖Top management commitment;
- *Reducing our impact on the environment through pollution prevention;
- Understanding and complying with environmental requirements;
- Continuous measurement and improvement of our environmental performance;
- ❖Setting and achieving environmental goals, objectives and targets.

>This program is designed to minimize the impact of Roundy's operations on the environment.

For this reason, NO TRACTOR IDLING is allowed on the premises when the temperature is above 10 degrees Fahrenheit. The only exception to the "no idle rule" is when the temperature is below 10 degrees Fahrenheit. A short warm up may occur to prevent diesel fuel from gelling and engine startup difficulties.

➤ No refer Idling while parked at the dock.

➤ Failure to comply with the above listed responsibilities will result in the refusal of your load and potential refusal of future deliveries into Roundy's facilities.

GREEN TIER

General Rules

- >Dry Goods or Grocery receiving hours are from Midnight 08:30 am.
- >There are no receiving clerks available to receive Perishables or Frozen loads until 4:00 am.
- ▶20 MPH speed limit in yard.

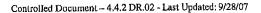
> Parking outside the Receiving Building is prohibited. You must park on the Commercial line of at your assigned dock door only.

- >No pets allowed Pets must remain in the tractor or be taken off of the property.
- >Smoking in designated area only.
- >Tires must be chocked before unloading.
- >It is the drivers' responsibility to unload and break down to Roundy's Ti x Hi configuration. Please resolve this with your dispatcher before backing into the dock.
- If you do not wish to unload, you can hire PLS (unloading service) Roundy's does not regulate fees charged by PLS. The clerk at the check-in window will direct you.
- >If you have unacceptable pallets, you will be expected to restack onto good wood.
- >Your dock person will show you where to place completed pallets.
- ➤Your dock person may be assigned up to 5 loads at a time. There may be delays while waiting for the dock person. Breaks are posted on the bulletin board in the Receiving office. Your punctuality and patience is greatly appreciated
- >During breaks and lunches, for safety reasons you are not allowed to continue working on unattended docks.
- >While unloading, or on Roundy's premises, you are required to maintain a professional and business-like manner.
- >Any driver or unloader not following these instructions or that creates a disturbance will be reloaded and the load will be rejected.
- >Some departments may have special instructions, such as having all weights on the outside of the pallet on variable weight meats.
- > Failure to comply with the above listed responsibilities will result in the refusal of your load and potential refusal of future deliveries into Houndy's facilities.

If you have any questions or concerns, please see a Shipping/Receiving Supervisor inside.

Thank you in advance for your continued cooperation,

The Roundy's Management Team (09/07)



Memorandum

KEE TRANS

Oconomowoc / Stevens Point Divisions

TO:

All Drivers

CC:

All Transportation Supervisors

DATE:

RE:

Idle Policy

Below is Roundy's updated idle policy effective immediately.

Refer Units;

Refer units are to be set at the proper temperature as indicated on your paper work. Refer units are to be set in the auto stop/start mode at all times, unless you are experiencing problems, and you have been directed to do differently by either the shop, or a Supervisor. All units are to be turned off prior to unloading at retail, or loading at a back haul point, unless advised differently by the shop personal, or a Supervisor. Once you empty out at a store, and are not picking up a back haul, or returning product which requires refrigeration, the trailer is to be kept in turned off. You are expected to confirm again that the refer unit is in the off position when you drop it.

When returning to the Distribution Center with a back haul, all loaded trailers are to be dropped in the yard set at the proper temperature as listed on the manufactures BOL.

Tractor Units:

Tractors are **NOT TO BE IDLED** at any time during the work day. The exceptions to this are, the outside temperature is above 90 or below 20 degrees Fahrenheit, you may idle if you are broken down or at a back haul location where you cannot wait inside that locations facility.

It is acceptable to warm a tractor up in the morning when you start your work day but this time should be kept to a minimum. No tractor is to be idled at any time while making a delivery or picking up a backhaul. Idle time wastes fuel and is hard on equipment. Cool down time is necessary only after a hard pull at high speed such as interstate travel. In most cases, the time required to back into the dock or drop a trailer will provide adequate cool down of the engine.



Appendix **D**

WDNR Green Tier Sustainability Metrics Spreadsheet

WISCONSIN DNR GREEN TIER					
SUSTAINABILITY METRICS	Period Covered: 201	7			
Company Name:	Roundy's	Roundy's			
Facility Name:	Oconomowoc Distribution Center	Oconomowoc Distribution Center			
Address;	111 Delafield Rd.				
City, State, Zip:	Oconomowoc, WI 53066	Oconomowac, WI 53066			
Environmental Coordinator:	Donna Graeff	Donna Graeff			
Coordinator Phone:	262-560-3534	262-560-3534			
Coordinator E-Mail:	donna.graeff@roundys.com	donna.graeff@roundys.com			
	Not Collected/	Period - if not			

Coordinator E-Mail:	donna.graeff@roundys.com			
Metric	Not Collected/ Not Available	Quantity	Units	Period - if not Calendar Year
DE	MOGRAPHICS			
Sales	×			
Money saved because of material or process improvements	x		\$	0
Profit or Loss	×		%	
Employees		626	Each	
Multiple between highest paid and lowest paid employee	×		%	
Alternative Transportation Support		53	Ride share particpants	
Total Purchases	x	53	\$	
In-State Purchases	x		\$	
% of Purchases Made from Companies that participate in Green				
Tier or Green Masters:			%	
Total Land	LAND	1,5	A	
Total Land Paved/Covered Land		112 Approx 60	Acres	
1 avec-covered Land	ENERGY	Approx. 60	Acres or sq ft	
	LINERGI	17,482,368	kWh	
Electricity		3.66%	% reduction	
		232,724	therms	
Natural Gas		-3.04%	% reduction	
Renewable Energy				
	WATER			
Total Water Used		10,888,000	gallons/year	
Total Fraction Cook		5%	% reduction	
Water Recycled/Reused	x		gallons/year	
,	x		% reduction	
egulated Pollutants Discharged	х		lbs/ year	
	x		% reduction	
	AIR	T	lha/ vaar	
Total Air Emissions	x		lbs/ year % reduction	
	×		lbs/ year	
zone-Depleting Substances	×		% reduction	
	x		lbs/ year	
reenhouse Gas Emissions	x		% reduction	
	WASTE			
Hazardous Waste Disposal (batteries recycled)		411,252	lbs/ year	
(-1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.		-42%	% reduction	
on-Hazardous Waste Disposal		1,306,400	lbs/ year	
· · · · · · · · · · · · · · · · · · ·		1%	% reduction	
Material Recycled/ Reused		63,450,700.00	lbs/ year	
Pagualad/ Paguad Contant	l	8%	% reduction	
Recycled/ Reused Content	NSDORTATION	L	% of product	L
Hybrid Vehicles	NSPORTATION		Each	
Gasoline Used	x		Gallons	
Diesel Used	<u> </u>	607,070	Gallons	
Alternative Fuels Used (CNG)		2,551	Equiv. Gal.	
ADDIT	TIONAL METRICS		······	
Please list all other certifications (for example: LEED, Energy St				

Appendix **E**

EMS Audit 2015 – Letter of Conformance



October 30, 2015

Dan Farrell Vice-President of Real Estate Roundy's Supermarkets, Inc. 875 E. Wisconsin Ave. MS3300 Milwaukee, WI 53202

RE: Roundy's 3rd Year EMS Audit 2015 Letter of Conformance

Dear Mr. Farrell,

Roundy's Supermarkets, Inc-Oconomowoc Distribution Center (Roundy's) is a Company that has voluntarily entered into a program with the Wisconsin Department of Natural Resources (Department) commonly referred to as "The Green Tier Program." The criteria for Roundy's participation within this program are found in Wisconsin Statute 299.83 (3) and are referred to as "Eligibility for Tier I." There are criteria in 299.83(3) (c) (4) requiring a commitment by the company to have an external qualified third-party perform an environmental management system audit at least once every three years.

Perfect Environmental Performance, LLC (PEP) was retained in 2015 to perform a 3rd party audit of Roundy's Environmental Management System (EMS) regarding its continued Functional Equivalency (FE) to ISO 14001 and conformance to the 15 Green Tier required elements. The PEP review used both the ISO 14001 (2004) Standard and the ss. 298.83 (dg) requirements as the basis for the review. The FE audit took place on October 22rd and 23rd, 2015 at the Distribution Center in Oconomowoc, WI. The review included a Level 1-4 documentation review, public document/communications review, interviews and observation of practices.

The results of the audit indicate that the Roundy's Distribution Center's environmental management system is in conformance with the requirements found in 299.83 (dg) of the Environmental Results Program and that it is operationally equivalent to the ISO 14001(2004) standard. There were no Major or Minor nonconformities identified during this audit. The Roundy's Environmental Management System also demonstrated performance that can be classified as "superior environmental performance". Based upon these findings, the Roundy's Oconomowoc Distribution Center environmental management system has been found to continue to meet the "Functionally Equivalent" criteria and the continual improvement requirements of the Green Tier Program.

This document may be submitted to the Wisconsin Department of Natural Resources to verify that your program continues to be functionally equivalent to an ISO 14001 program.

If you have any questions about this determination, please feel free to contact me to discuss them.

Sincerely,

PERFECT ENVIRONMENTAL PERFORMANCE, LLC

Karissa Anderson

Kunssa And

Environmental Coordinator and EMS Practice Leader

Green Tier Recognized Auditor tanderson@pep-services.com